

IN THE IOWA DISTRICT COURT FOR MARION COUNTY

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CAROL SAGE
MARION COUNTY, IA
CLERK OF DISTRICT COURT

VALERIE BANDSTRA, ANNE
BANDSTRA, RYAN BANDSTRA, and
JASON BANDSTRA,

Plaintiffs,

v.

PATRICK EDOUARD, COVENANT
REFORMED CHURCH, UNITED
REFORMED CHURCHES IN NORTH
AMERICA, CLARENCE HETTINGA,
ARNOLD VAN DONSELAAR,
NORMAN VAN MERSBERGEN,
WILLIAM HARTMAN, and the BOARD
OF ELDERS OF COVENANT
REFORMED CHURCH,

Defendants.

PATRICK EDOUARD,

Counterclaimant,

v.

VALERIE BANDSTRA, ANNE
BANDSTRA, RYAN BANDSTRA, and
JASON BANDSTRA,

Counterclaim-Defendants.

CASE NO. LACV094670

ANSWER & COUNTERCLAIM
BY DEFENDANT EDOUARD
(Jury Trial Demanded)

COMES NOW Defendant Patrick Edouard ("Edouard") and for his Answer, Affirmative
Defenses, and Counterclaim to Plaintiffs' Petition, states to the court the following:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Paragraph 4 is admitted.
5. Paragraph 5 is admitted.
6. Paragraph 6 is admitted.
7. Paragraph 7 is denied for lack of knowledge.
8. Paragraph 8 is denied for lack of knowledge.
9. Paragraph 9 is admitted.
10. Paragraph 10 is admitted in part as to venue, and denied in part as to allegations of unlawful actions and injuries sustained.
11. Paragraph 11 is denied.
12. Paragraph 12 is denied.
13. Paragraph 13 is denied for lack of knowledge.
14. Paragraph 14 is admitted.
15. Paragraph 15 is admitted.
16. Paragraph 16 is admitted.
17. Paragraph 17 is denied.
18. Paragraph 18 is denied.
19. Paragraph 19 is denied.
20. Paragraph 20 is denied.
21. Paragraph 21 is denied.
22. Paragraph 22 is denied.

23. Paragraph 23 is denied.
24. Paragraph 24 is denied.
25. Paragraph 25 is denied.
26. Paragraph 26 is denied.
27. Paragraph 27 is admitted to the extent that Edouard and Anne Bandstra did mutually kiss at Anne Bandstra's house.
28. Paragraph 28 is denied.
29. Paragraph 29 is admitted.
30. Paragraph 30 is denied.
31. Paragraph 31 is denied.
32. Paragraph 32 is admitted to the extent that Ryan Bandstra was told that Edouard and Anne Bandstra had kissed on December 10, 2010.
33. Paragraph 33 is denied for lack of knowledge.
34. Paragraph 34 is denied for lack of knowledge.
35. Paragraph 35 is admitted.
36. Paragraph 36 is admitted to the extent that Valerie Bandstra did state around this time that Edouard raped her. It is denied that Edouard did rape her. It is unknown what meeting is being referred to and so the remainder is denied for lack of knowledge.
37. Paragraph 37 is denied for lack of knowledge.
38. Paragraph 38 is denied for lack of knowledge.
39. Paragraph 39 is denied for lack of knowledge.

40. Paragraph 40 is denied for lack of knowledge.
41. Paragraph 41 is denied.
42. Paragraph 42 is denied.
43. Paragraph 43 is denied.
44. Paragraph 44 is denied.
45. Paragraph 45 is denied.
46. Paragraph 46 is denied.
47. Paragraph 47 is denied.
48. Paragraph 48 is denied.
49. Paragraph 49 is denied.
50. Paragraph 50 is denied for lack of knowledge.
51. Paragraph 51 is denied.
52. Paragraph 52 is denied.
53. Paragraph 53 is denied.
54. Paragraph 54 is denied.
55. Paragraph 55 is denied.
56. Paragraph 56 is denied.
57. Paragraph 57 is denied.
58. Paragraph 58 is denied.
59. Paragraph 59 is denied.
60. Paragraph 60 is denied.
61. Paragraph 61 is denied.
62. Paragraph 62 is denied.

- 63. Paragraph 63 is denied.
- 64. Paragraph 64 is denied.
- 65. Paragraph 65 is denied.
- 66. Paragraph 66 is denied.
- 67. Paragraph 67 is denied.
- 68. Paragraph 68 is denied.
- 69. Paragraph 69 is denied.
- 70. Paragraph 70 is admitted as to Edouard being Plaintiffs' pastor, but denied as to being Plaintiffs' counselor.
- 71. Paragraph 71 is denied.
- 72. Paragraph 72 is denied.
- 73. Paragraph 73 is denied.
- 74. Paragraph 74 is denied.
- 75. Paragraph 75 is denied.
- 76. Paragraph 76 is denied.
- 77. Paragraph 77 is denied for a lack of knowledge.
- 78. Paragraph 78 is denied.
- 79. Paragraph 79 is denied.
- 80. Paragraph 80 is denied for lack of knowledge.
- 81. Paragraph 81 is denied.
- 82. Paragraph 82 is denied.
- 83. Paragraph 83 is denied.
- 84. Paragraph 84 is admitted.

85. Paragraph 85 is denied.
86. Paragraph 86 is denied.
87. Paragraph 87 is denied.
88. Paragraph 88 is denied.
89. Paragraph 89 is denied.
90. Paragraph 90 is denied.
91. Paragraph 91 is denied.
92. Paragraph 92 is denied.
93. Paragraph 93 is admitted as to employing Edouard, but denied for lack of knowledge as to creating an agency.
94. Paragraph 94 is admitted as to Edouard being an employee of the church, but denied for lack of knowledge as to being an agent for the Church, or an employee or agent for the Elders.
95. Paragraph 95 is denied.
96. Paragraph 96 is denied for lack of knowledge.
97. Paragraph 97 is denied for lack of knowledge.
98. Paragraph 98 is denied for lack of knowledge.
99. Paragraph 99 is denied for lack of knowledge.
100. Paragraph 100 is denied for lack of knowledge.
101. Paragraph 101 is denied for lack of knowledge.
102. Paragraph 102 is denied.
103. Paragraph 103 is denied.
104. Paragraph 104 is denied.

- 105. Paragraph 105 is denied.
- 106. Paragraph 106 is admitted.
- 107. Paragraph 107 is admitted.
- 108. Paragraph 108 is denied for lack of knowledge.
- 109. Paragraph 109 is denied.
- 110. Paragraph 110 is denied.
- 111. Paragraph 111 is denied.
- 112. Paragraph 112 is denied.
- 113. Paragraph 113 is denied.
- 114. Paragraph 114 is denied for lack of knowledge.
- 115. Paragraph 115 is denied for lack of knowledge.
- 116. Paragraph 116 is denied for lack of knowledge.
- 117. Paragraph 117 is denied for lack of knowledge.
- 118. Paragraph 118 is denied for lack of knowledge.
- 119. Paragraph 119 is denied for lack of knowledge.

GENERAL DENIAL

- 120. To the extent that Edouard has not responded to an allegation in any paragraph, Defendant denies the allegation therein.

**ADDITIONAL FACTS RELATED TO DEFENDANT EDOUARD'S AFFIRMATIVE
DEFENSES AND COUNTERCLAIMS**

121. Edouard realleges and incorporates its responses to paragraphs 1 through 120 as if fully set out herein.
122. Edouard and Plaintiff Valerie Bandstra engaged in a consensual affair beginning in 2006 and ending in 2007.
123. Edouard never provided mental health services to Valerie Bandstra.
124. Plaintiff Valerie Bandstra initiated sexual activity with Edouard on numerous occasions.
125. Edouard and Plaintiff Anne Bandstra engaged in a consensual affair beginning in 2008 and ending in December 2010.
126. Plaintiff Anne Bandstra initiated sexual activity with Edouard on numerous occasions.
127. Edouard never provided mental health services to Anne Bandstra.
128. Plaintiff Anne Bandstra was caught in her extramarital affair with Edouard by her husband, Plaintiff Ryan Bandstra.
129. Plaintiff Valerie Bandstra was having an affair with a third party, Ramiro Cruz Montemayor in 2010.
130. Plaintiff Valerie Bandstra's husband, Plaintiff Jason Bandstra, discovered Valerie Bandstra's affair with Montemayor in the spring of 2010.
131. The affair between Montemayor and Valerie Bandstra was the cause of marital strife between Valerie Bandstra and Jason Bandstra.

132. Plaintiff Valerie Bandstra only first claimed Edouard had raped her after Valerie Bandstra discovered Edouard was having an affair with Anne Bandstra, and after she had been caught in her affair with Montemayor.
133. Plaintiff Valerie Bandstra's false claim of rape caused two other women to falsely claim Edouard had raped them.

AFFIRMATIVE DEFENSES

134. Plaintiffs have failed to state a claim upon which relief can be granted.
135. Plaintiffs' claims may be barred by the doctrines of estoppel, laches, standing, waiver and other equitable doctrines as discovery may establish.
136. Plaintiffs' claims may be subject to comparative fault under Iowa Code section 668.
137. Plaintiffs' claims may be barred by the statute of limitations.
138. Plaintiffs may have failed to mitigate their damages and, therefore, any recovery by Plaintiffs should not include any loss which Plaintiffs could have prevented by reasonable care and diligence.
139. Plaintiffs' actions may bar the relief sought by Plaintiff under the equitable doctrine of unclean hands.
140. If Plaintiffs sustained any damages as alleged in Plaintiffs' Petition, which Defendant Edouard specifically denies, the assessment of exemplary or punitive damages violates Defendant Edouard's constitutional rights under the Fifth, Sixth, Eighth and Fourteenth Amendments of the United States Constitution and comparable provisions of the Iowa Constitution.

141. Defendant Edouard reserves the right to amend his Answer to assert such affirmative defenses as may become available through discovery.

WHEREFORE, Defendant requests that Plaintiffs' Petition be dismissed at Plaintiff's costs.

COUNTERCLAIMS

COUNT 1: DEFAMATION (LIBEL & SLANDER) AGAINST VALERIE BANDSTRA

142. Paragraphs 1-141 are repleaded and incorporated as if fully set forth herein.
143. Beginning on or about December 14, 2010, Plaintiff Valerie Bandstra began orally telling individuals that she had been raped by Edouard.
144. Plaintiff Valerie Bandstra made these oral statements that she was raped by Edouard to members of Covenant Reformed Church, to members of the community, and to other third parties.
145. On or about January 18, 2011, Plaintiff Valerie Bandstra made an oral statement to law enforcement claiming Edouard had raped her.
146. On or about January 24, 2011, Plaintiff Valerie Bandstra made a writing accusing Edouard of raping her which was given to law enforcement.
147. Throughout 2011 and 2012 Plaintiff Valerie Bandstra continued to make statements to people known and unknown to Edouard that Edouard had raped her.
148. Throughout 2011, Plaintiff Valerie Bandstra encouraged acquaintances and strangers to "google" Edouard so that they would read her claims of rape on the internet.

149. In 2010 through 2012 Plaintiff Valerie Bandstra made false oral and written statements that Edouard had extorted money from her.
150. The oral and written statements that Patrick Edouard had raped Valerie Bandstra, and that Edouard had extorted money, were false and known to be false by Plaintiff Valerie Bandstra at the time they were made.
151. Valerie Bandstra's false claims of rape were further published by newspapers, radio, internet and other news sources across the country.
152. Each oral and written statement by Valerie Bandstra constitutes a republication of the libelous and defamatory statements of Plaintiff Valerie Bandstra regarding Edouard.
153. These statements made by Plaintiff Valerie Bandstra about Edouard are libel and slander per se as they represent indictable criminal conduct punishable by imprisonment and involving moral turpitude.
154. Edouard is not a public official or public figure.
155. The statements made by Plaintiff Valerie Bandstra about Edouard were not privileged, or in the alternative, if they were subject to a privilege, the privilege was exceeded or abused in that the actions of Plaintiff Valerie Bandstra went beyond the duty, if any, she had to make the statements, was done in a manner not justified by the occasion, and was continued after Plaintiff Valerie Bandstra had the full opportunity, information and documentation to know that her defamatory statements were false and unjustified.
156. The subject matter of Plaintiff's statements about Edouard is not a matter of public concern.

157. As the statements are slanderous per se, damages are allowable to Edouard without specific proof of specific actual damage, and damages to Edouard may be implied by law.
158. Edouard suffered actual damages as a result of the false statements made by Valerie Bandstra.
159. The false and defamatory statements, written communications, and publications of Plaintiff Valerie Bandstra were a proximate cause of the actual damages to Edouard.
160. The damages to Edouard include, but are not limited to, attorney fees, past and future loss of earnings, loss of future earning capacity, past and future mental pain and suffering, and damage to his reputation.
161. The conduct of Plaintiff Valerie Bandstra in making the false and defamatory per se statements was done with malice and knowledge of the falsity of the statements or with reckless disregard for the truth or falsity of the statements and its impact on Edouard, all of which necessitate an assessment of punitive damages.

WHEREFORE Edouard demands judgment against Plaintiff Valerie Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Valerie Bandstra in an amount sufficient to punish her and deter her and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT II – MALICIOUS PROSECUTION AGAINST VALERIE BANDSTRA

162. Paragraphs 1-161 are repleaded and incorporated as if fully set forth herein.
163. Valerie Bandstra initiated a previous prosecution against Edouard for sexual abuse in the third degree.
164. Edouard was charged with the offense of sexual abuse in the third degree as a result of Plaintiff Valerie Bandstra's actions.
165. Edouard was acquitted by a jury of this offense.
166. Valerie Bandstra did not have probable cause to file this complaint against Edouard.
167. Valerie Bandstra had malice in bringing the prosecution against Edouard.
168. Edouard suffered damages by this wrongful prosecution including but not limited to attorney fees, past and future loss of earnings, loss of future earning capacity, past and future mental pain and suffering, and damage to his reputation.

WHEREFORE Edouard demands judgment against Plaintiff Valerie Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Valerie Bandstra in an amount sufficient to punish her and deter her and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT III - ABUSE OF PROCESS AGAINST VALERIE BANDSTRA

169. Paragraphs 1-168 are repleaded and incorporated as if fully set forth herein.

170. Valerie Bandstra instituted charges of sexual abuse in the third degree against Edouard, thereby procuring a criminal prosecution of Edouard by Marion County and the Attorney General's office.
171. The prosecution for sexual abuse in the third degree resulted in an acquittal of the charge, favorable to Edouard.
172. The charges brought and the resulting prosecution were without sufficient probable cause to accuse Edouard of a crime, and were brought willfully and wantonly, with malice on part of Plaintiff Valerie Bandstra, and in reckless disregard of the rights of Edouard.
173. The actions of Plaintiff Valerie Bandstra were a proximate cause of the damage to Edouard, including unjust arrest and imprisonment and the deprivation of Edouard's fundamental civil rights; humiliation, embarrassment, and severe mental and emotional distress; expenses incurred in defending the criminal charges; damages affecting Edouard's employment, reputation and livelihood; and exposure to public hatred, contempt, and ridicule, entitling him to compensatory and punitive damages in a fair and reasonable amount to be determined by the finder of fact.

WHEREFORE Edouard demands judgment against Plaintiff Valerie Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Valerie Bandstra in an amount sufficient to punish her and deter her and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT IV – LIBEL AGAINST RYAN BANDSTRA

174. Paragraphs 1-173 are repleaded and incorporated as if fully set forth herein.
175. On or about December 2010 or January 2011 Ryan Bandstra wrote a flyer, attached as Exhibit A, claiming that Edouard was a “sexual predator,” that he had “coerce[d] approximately a dozen married women into sexual relations,” that he had engaged in “rape,” that he had committed “sexual assault,” that he was engaged as these women’s “counselor” and included Edouard’s home address of 506 Brabant Laan.
176. On or about December 2010 or January 2011 Ryan Bandstra distributed this flyer to third parties throughout Pella.
177. Ryan Bandstra’s statements in the flyer were false and known by Ryan Bandstra to be false at the time they were written and published.
178. Beginning on or about December 2010 and continuing through January 2011 Ryan Bandstra wrote a list of names purporting to be the names of women Edouard had had sexual relationships with, who he had raped or who he had sexually misused.
179. This list of names was published to at least two other persons, including Anne Bandstra and Wanda Brand, and possibly to other third parties.
180. Ryan Bandstra’s statements in list were known by Ryan Bandstra to be false at the time they were written and published.
181. These false and defamatory statements and communications by Ryan Bandstra in the flyer and list were not privileged.

182. The false and defamatory statements and communications of Ryan Bandstra were a proximate cause of damages to Edouard.
183. The flyer and the list of names were defamatory per se in that they accused Edouard of an indictable crime and tended to injure him in his business and trade.
184. Edouard suffered actual damages as a result of the publication of the flyer and list.

WHEREFORE Edouard demands judgment against Plaintiff Ryan Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Valerie Bandstra in an amount sufficient to punish her and deter her and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST ALL PLAINTIFFS

185. Paragraphs 1-184 are repleaded and incorporated as if fully set forth herein.
186. Plaintiffs engaged in a course of conduct to harass, intimidate, and threaten Edouard as a result of his affairs with Valerie Bandstra and Anne Bandstra.
187. Beginning on December 15, 2010, Ryan Bandstra and Jason Bandstra threatened physical harm to Edouard for his relationships with their wives.
188. Throughout December 2010 and January 2011 Ryan Bandstra drove in front of Edouard's house multiple times each day and parked across the ravine to look at his house.
189. As a result of Ryan Bandstra's actions, police provided 24 hour surveillance to the Edouard family.

190. Throughout January 2011 Ryan Bandstra would tailgate the Edouard vehicle with Edouard and his family in it.
191. Throughout January 2011 the Edouard family had to request police escorts in order to be safe from Ryan Bandstra's stalking and obsessive behavior.
192. On or about January 12, 2011, Plaintiff Anne Bandstra made a false report to DHS alleging child sexual abuse by Edouard, resulting in a trip to the Edouard house by DHS employees, interviews of family members, and interviews of the Edouard children.
193. On or about January 3, 2011, Plaintiffs caused a brick to be thrown through Edouard's young son's bedroom window in the middle of the night, shattering the window, covering the room in glass.
194. On or about January 3, 2011, Plaintiffs caused a second brick to be thrown at the Edouard house, which hit the gutter.
195. On or about January 3, 2011, Plaintiffs caused nails to be strewn about Edouard's driveway and behind Edouard's vehicle in order to puncture its tires.
196. Throughout early January, 2011, Plaintiffs caused numerous doorbell rings at the Edouard house to harass them.
197. Throughout early January 2011, Plaintiffs caused Edouard's house and television to falsely be listed for sale on craigslist.com, and was done in a manner so as to maximize the harassment of Edouards and caused the Edouards to have to disconnect their phone line.
198. On or about early January, 2011, Plaintiffs caused pizza to be wrongly delivered to Edouard's house.

199. Throughout 2011, Plaintiffs caused vulgarities to be spray painted on the Covenant Reform Church, Edouard's former employer, and called in false fires to cause the church to evacuate.
200. Throughout 2011, Plaintiffs caused threats of harm and death to be made to witnesses in the criminal trial of Edouard, including but not limited to Greg Horstman.
201. Throughout 2011, including specifically, July 10, 2011, Plaintiffs Jason Bandstra and Ryan Bandstra made threats against Defendant Arnold Van Donselaar if he continued to provide moral support to Edouard during the criminal trial.
202. On or about December 21, 2011, Ryan Bandstra took a shotgun and threatened to kill Anne Bandstra, Valerie Bandstra, and others, purporting to be upset because of Edouard's affair with his wife.
203. From 2010 through 2012 Plaintiff Valerie Bandstra spread false rumors that Edouard had raped her.
204. Throughout 2011 and 2012 Plaintiffs Anne Bandstra and Valerie Bandstra spread false rumors that Edouard had been their counselor providing them mental health treatment and denied having consensual affairs with him.
205. The Plaintiffs intended to cause emotional distress for Edouard by these outrageous actions.
206. As a result of Plaintiffs actions Edouard suffered severe and extreme emotional distress.
207. Plaintiffs' outrageous conduct and actions were the actual and proximate cause of Edouard's emotional distress.

WHEREFORE Edouard demands judgment against all Plaintiffs in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiffs in an amount sufficient to punish them and deter them and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT VI – ASSAULT AGAINST RYAN BANDSTRA

- 208. Paragraphs 1-207 are repleaded and incorporated as if fully set forth herein.
- 209. On or about December 15, 2010, Plaintiff Ryan Bandstra intentionally and unlawfully threatened Edouard with present ability to do violence to Edouard.
- 210. Plaintiff Ryan Bandstra's actions on December 15, 2010, as well as his continuous harassment and stalking of Edouard and his family throughout 2011 put Edouard in reasonable and serious apprehension of a harmful and offensive contact against his person.
- 211. Plaintiff Ryan Bandstra intentionally and maliciously made Edouard believe that Ryan Bandstra would harm him.
- 212. These assaults were the proximate cause of Edouard's emotional injuries and damages.

WHEREFORE Edouard demands judgment against Plaintiff Ryan Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Ryan Bandstra in an amount sufficient to punish him and deter him and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as

allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

COUNT VII – SLANDER AGAINST ANNE BANDSTRA

213. Paragraphs 1-212 are repleaded and incorporated as if fully set forth herein.
214. On or about January 12, 2011, Plaintiff Anne Bandstra made an oral report of child sexual abuse against Edouard to the Iowa Department of Human Services.
215. Plaintiff Anne Bandstra's report of child abuse was false and known to be false by Plaintiff Anne Bandstra at the time she made the statements.
216. This false report of child abuse was slander per se because it represents indictable criminal conduct punishable by imprisonment and involving moral turpitude.
217. Edouard is not a public official or public figure.
218. The statements made by Plaintiff Anne Bandstra about Edouard were not privileged, or in the alternative, if they were subject to a privilege, the privilege was exceeded or abused in that the actions of Anne Bandstra went beyond the duty, if any, she had to make the statements, was done in a manner not justified by the occasion, and was continued after Anne Bandstra had the full opportunity, information and documentation to know that her defamatory statements were false and unjustified.
219. The subject matter of Plaintiff's statements about Edouard is not a matter of public concern.
220. As the statements are slanderous per se, damages are allowable to Edouard without specific proof of specific actual damage, and damages to Edouard may be implied by law.

221. Edouard suffered actual damages as a result of the false statements made by Anne Bandstra.
222. The false and defamatory statements, written communications, and publications of Plaintiff Anne Bandstra were a proximate cause of the actual damages to Edouard.
223. The damages to Edouard include, but are not limited to, attorney fees, past and future loss of earnings, loss of future earning capacity, past and future mental mail and suffering, and damage to his reputation.
224. The conduct of Plaintiff Anne Bandstra in making the false and defamatory per se statements was done with malice and knowledge of the falsity of the statements or with reckless disregard for the truth or falsity of the statements and its impact on Edouard, all of which necessitate an assessment of punitive damages.

WHEREFORE Edouard demands judgment against Plaintiff Anne Bandstra in an amount that will fully and fairly compensate for his injuries and damages, for punitive damages against Plaintiff Anne Bandstra in an amount sufficient to punish her and deter her and others from the same or similar wrongful conduct, court costs, attorneys' fees if allowed by law, interest as allowed by law, and for such other appropriate relief as the Court finds may be just and equitable.

CONCLUSION

WHEREFORE, Edouard requests the court enter judgment against Plaintiffs on all counts and grant Edouard actual damages and punitive damages and for interest and costs as allowed by law.

JURY DEMAND

COMES NOW the Defendant and hereby demands a trial by jury of all of the issues arising out of the matters pled herein.

RESPECTFULLY submitted this 3rd day of January 2012.



Angela L. Campbell AT# 0009086
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PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing instrument was served upon each of the attorneys of record, or the parties if unrepresented, at their respective addresses if disclosed on the pleadings.

By: ☒ U.S. Mail ☐ Fax
☐ Courthouse Mail ☐ Hand delivered
☐ Certified Mail ☐ Other

Signature: 

Date: 1/3/13



Be Aware!

There may be a sexual predator in your neighborhood! *"The term **sexual predator** is used pejoratively to describe a person seen as obtaining or trying to obtain sexual contact with another person in a metaphorically "predatory" manner.."*

While pastoring a local church, this man gained the trust and respect of his followers. He used individual "counseling" sessions to coerce approximately a dozen married women into sexual relations. *1 Timothy 3:2 Now the overseer is to be above reproach, faithful to his wife, temperate, self-controlled, respectable...*

After his actions were witnessed, he resigned his position. But then, led the congregation to believe that the women had not been victimized. *"Physical force is not necessarily used in rape, and physical injuries are not always a consequence."*, and that **HE** had been seduced. **No attempt to make amends or apologize has been made.**

None of the women are willing to press charges due to behavioral, or characterological self blame (common in sexual assault).

For the security of our families and the dignity of these poor women, we cannot allow such vile actions such as these to go unchecked and unnoticed. *1 Cor 5:9-11 I wrote to you in my letter not to associate with sexually immoral people 10 not at all meaning the people of this world who are immoral, or the greedy and swindlers, or idolaters. In that case you would have to leave this world. 11 But now I am writing to you that you must not associate with anyone who claims to be a brother or sister but is sexually immoral or greedy, an idolater or slanderer, a drunkard or swindler. Do not even eat with such people.*

This letter has been sent to the homes surrounding the address of 506 Brabant Laan.